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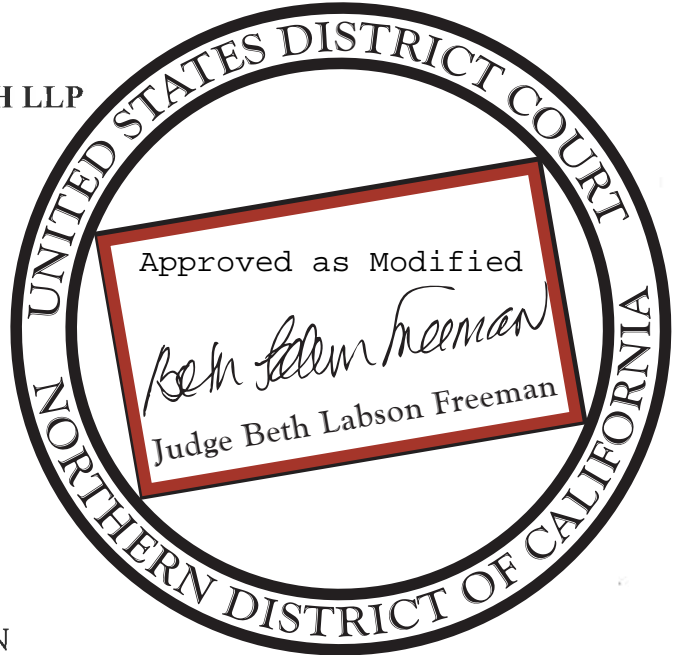
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Attorney for Plaintiff, ELIZABETH GILSON



UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

ELIZABETH GILSON,

Plaintiff,

v.

SECTEK, INC., and DOES 1 through 200,
inclusive,

Defendants.

Case No. 5:15-cv-04772-BLF

JOINT DISCOVERY SCHEDULE

Judge: Hon. Beth L. Freeman

Date: March 11, 2016

Plaintiff Elizabeth Gilson ("Plaintiff"), by and through her counsel of record, Frank P. Sarro, Esq., and Defendant Sectek, Inc. ("Defendant"), by and through its counsel of record, John Barber, Esq., Joseph R. Lordan, Esq. and Marcus J. Lee, Esq. of Lewis Brisbois Bisgaard & Smith LLP, hereby submit their Joint Discovery Schedule pursuant to the Court's February 22, 2016 Case Management Order.

I. DISCOVERY SCHEDULE

The parties propose the following scheduling for the Court's review and approval:

| | |
|---|---|
| Last Day to Amend Pleadings or Add Parties: | 08/04/2017 December 15, 2016 |
| Fact Discovery Cut-off: | 08/04/2017 |
| Last Day to Disclose Experts: | 08/11/2017 |
| Expert Discovery Cut-off: | 09/07/2017 |
| Last Day to Hear Dispositive Motions: | 06/08/2017 (set by the Court) |
| Final Pretrial Conference: | 09/07/2017 (set by the Court) |
| Jury Trial: | 09/25/2017 (set by the Court) |

II. DEPOSITIONS

The parties intend to take the following depositions prior to the mediation deadline of June 30, 2016:

For Plaintiff

Michael Harris

Rhett Weddell

For Defendant

Plaintiff Elizabeth Gilson

The parties intend to take the above depositions between May 2 – May 13, 2016.

DATED: March 11, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Marcus J. Lee

John L. Barber

Joseph R. Lordan

Marcus J. Lee

Attorneys for Defendant SECTEK, INC.

DATED: March 11, 2016

By: /s/ Frank P. Sarro

Frank P. Sarro

Attorney for Plaintiff ELIZABETH GILSON

FEDERAL COURT CERTIFICATE OF SERVICE*Gilson v. SecTek, Inc., et al.*

USDC-ND, San Jose Division Case No. 5:15-cv-04772-BLF

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to the action. My business address is 333 Bush Street, Suite 1100, San Francisco, CA 94104-2872. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On March 11, 2016, I served the following document(s): **JOINT DISCOVERY SCHEDULE**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Frank P. Sarro, Esq.
2121 North California Boulevard, Suite 290
Walnut Creek, CA 94596
Attorney for Plaintiff Elizabeth Gilson

Tel: 415.816.5141
Fax:
Email: fpsarro@hotmail.com

The documents were served by the following means:

- ☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above (excluding those not registered for CM/ECF who were served by mail, if applicable.)

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on March 11, 2016, at San Francisco, California.

/s/ Berenice Barragan
Berenice Barragan